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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Jeremy Stanfield, Romonia Persaud, and  
Shabnam Sheila Dehdashtian, individually, on  
behalf of all others similarly situated, and on  
behalf of the general public,

Plaintiffs,

v.

First NLC Financial Services, LLC, and  
DOES 1 through 50 inclusive,

Defendants.

Case No. C 06-3892 SBA JL

**STIPULATION AND [PROPOSED]  
ORDER ISSUING RENEWED  
JUDICIAL NOTICE OF  
COLLECTIVE ACTION AND  
SETTING OPT-IN DATES OF  
CERTAIN PLAINTIFFS IN  
COLLECTIVE ACTION**

Judge: Hon. Sandra B. Armstrong

Date Action Filed: June 22, 2006

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**Attorneys for Defendant**  
**First NLC Financial Services, LLC**

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1 PURSUANT TO LOCAL RULE 7-12, Plaintiffs Jeremy Stanfield, *et al.* and  
2 Defendant First NLC Financial Services, LLC (collectively, “the parties”) stipulate as follows:

3 WHEREAS, the parties have discovered that the original list of putative class  
4 members was missing putative class members;

5 WHEREAS, the parties have agreed, upon Court approval, to conduct a second  
6 mailing of the Court-approved notice and conduct a second sixty-day opt-in period for individuals  
7 missing from the original class list;

8 WHEREAS, through stipulation of the parties and Court order, plaintiffs filed a  
9 second amended complaint to include individuals who worked in a fourth job title, Branch  
10 Processor, to be included in the collective action;

11 WHEREAS, the parties stipulate that individuals in the Branch Processor title may  
12 receive notice of this collective action and have a sixty day period to opt into the collective  
13 action;

14 WHEREAS, the parties have agreed upon the language to be contained in the  
15 Court-approved notice to both the individuals missing from the original list of putative class  
16 members and the Branch Processors (**ATTACHMENT 1**);

17 WHEREAS, the parties have agreed that certain individuals whose consent forms  
18 were not served by the original opt-in deadline (February 12, 2007) will be permitted to opt-into  
19 the suit, on the dates indicated on the attached list (**ATTACHMENT 2**);

20 WHEREAS, nothing by this stipulation or any other written or oral agreement by  
21 First NLC shall be construed as an admission or a waiver that class certification or a collective  
22 action for any of these job positions identified in plaintiffs’ complaints or in this case is  
23 appropriate;

24 IT IS HEREBY STIPULATED by and between the parties to this action through  
25 their designated counsel as follows:

26 The parties respectfully request that this Court approve for immediate mailing  
27 **ATTACHMENT 1** (renewed judicial notice) and adopt for all purposes the opt-in dates indicated  
28 on **ATTACHMENT 2**.

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3 Dated: March 16, 2007

NICHOLS KASTER & ANDERSON, LLP

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6 By: \_\_\_\_\_/s/  
Bryan J. Schwartz  
Attorneys for Plaintiffs and Representative Plaintiffs  
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8 Dated: March 16, 2007

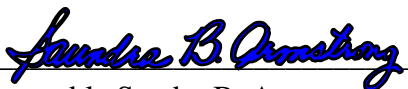
9 ORRICK, HERRINGTON & SUTCLIFFE LLP  
10 NELSON MULLINS RILEY & SCARBOROUGH  
LLP

11  
12  
13 By: \_\_\_\_\_/s/  
Michael D. Weil  
Attorneys for Defendant  
14 First NLC Financial Services, LLC  
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16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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20 Dated: 3/20/07

  
Honorable Sandra B. Armstrong  
United States District Court Judge  
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